

UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF THE UNITED STATES TRUSTEE
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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|---------------------|---|--------------------------------|
| | : | Case No. 18-33676 (JKS) |
| In re | : | Chapter 7 |
| | : | |
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| Volvic A. Chaperon, | : | The Honorable John K. Sherwood |
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| | : | |
| Debtor. | : | |
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**APPLICATION FOR THE ENTRY OF A CONSENT ORDER EXTENDING TIME TO
FILE A MOTION TO DISMISS CASE UNDER 11 U.S.C. § 707(b)(1) AND (3) AND
EXTENDING TIME TO FILE A COMPLAINT OBJECTING TO DISCHARGE UNDER
11 U.S.C. § 727**

The Acting United States Trustee (“U.S. Trustee”), by and through counsel, in furtherance of his duties and responsibilities under 28 U.S.C. §§ 586(a)(3) and (5), hereby respectfully submits this Application for the entry of the *Consent Order Extending Time to File a Motion to Dismiss Case Under 11 U.S.C. §§ 707(b)(1) and (3) and Extending Time to File a Complaint Objecting to Discharge Under 11 U.S.C. § 727*.

1. In support of this Application, the U.S. Trustee respectfully represents as follows: The docket for this case reflects that on November 30, 2018, Volvic A. Chaperon (“Debtor”) filed a

voluntary petition for relief under chapter 7 of title 11 of the United States Code (“Bankruptcy Code”).

2. The docket also reflects that a meeting of creditors pursuant to 11 U.S.C. § 341(a) was scheduled to be held on January 7, 2019.

3. The U.S. Trustee is conducting an independent review of the Debtor’s case warranting further investigation.

4. The U.S. Trustee seeks an extension of time to file a motion to dismiss or object to discharge. Debtor, through counsel, agreed to the extension.

5. The Debtor is cooperating and the investigation is ongoing.

6. Unless the consent order is entered, the Debtor will automatically be issued a discharge upon expiration of the current March 8, 2019, deadline, before the U.S. Trustee completes its investigation. As a result, the Acting United States Trustee respectfully requests that the Court enter the Consent Order and extend the deadline for filing a motion to dismiss under 11 U.S.C. §§ 707(b)(1) and (3) or a complaint objecting to discharge under 11 U.S.C. § 727, to May 7, 2019, as agreed to by the Debtor.

7. The Acting United States Trustee reserves his rights to seek any additional extensions of time for good cause shown.

Respectfully submitted,
ANDREW R. VARA
ACTING UNITED STATES TRUSTEE
REGION 3

By: /s/ Jeffrey M. Sponder
Jeffrey M. Sponder
Trial Attorney

DATED: March 8, 2019